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**TECHNICAL REVIEW DOCUMENT  
FOR  
OPERATING PERMIT 00OPEA228**

Eagle County Landfill  
Eagle County  
Facility ID: 0370072

Prepared by Long B. Nguyen  
October 22, 2002

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Operating Permit 00OPEA228 was first issued for the Eagle County Landfill on September 1, 2001. Permit Condition 1.1 of Section II requires the source to track the VOCs and CO emissions from the landfill on a 12-month rolling basis, using EPA's Landfill Gas Model (LandGem). At the time of the permit issuance, the source did not question the frequency that was required of them to determine compliance with the emission limits. After an annual inspection of the facility by the Division in July of 2002, the Division determined that the source was not tracking the emissions on a 12-month rolling basis. The source felt that the monthly frequency was unreasonable for their operation. They decided to submit a permit application to have Condition 1.1 be modified from a 12-month rolling basis to an annual basis. The Division received an application from the source on October 11, 2002.

The Division has reviewed the application, and the Division has determined that the source's request could be granted. EPA's Landfill Gas Model is designed to calculate the landfill gas emissions on an annual basis - not on a monthly basis. In recent permits that have been issued for other landfills, the Division has required those sources to demonstrate compliance with the landfill gas emissions on an annual basis. Condition 1.1 of Section II of the permit has been modified to reflect this change.